



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

March 10, 2025

BY ECF

Hon. Jesse M. Furman
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *ACLU et al. v. U.S. Immigration and Customs Enforcement et al.*,
No. 24 Civ. 7290 (JMF)

Dear Judge Furman:

This Office represents the defendant agencies in the above-referenced action brought under the Freedom of Information Act. I write respectfully on behalf of all parties pursuant to the Court's order of December 10, 2024, ECF No. 38, to provide the Court with a status update on the agencies' searches and productions.

- U.S. Immigration and Customs Enforcement completed additional searches and has now located approximately 2,000 pages of records, including some spreadsheets, some of which may be duplicates or nonresponsive; it will process these at the rate of approximately 500 pages per month and made its first production on January 17, 2025
- U.S. Department of Homeland Security has completed its searches, and has made productions on January 10, February 10, and March 6, 2025
- U.S. Department of State located approximately a large number of potentially responsive records, has begun processing them (at the rate of 450 pages every six weeks), and sent out its first production letter on February 4, 2025; the parties are still discussing ways to narrow the scope of the search to decrease the volume of results
- U.S. Coast Guard has now completed its searches, and made its first production on March 10, 2025
- U.S. Navy completed its searches and made its production on December 20, 2024
- U.S. Citizenship and Immigration Services completed its initial searches which located approximately 40,000 pages of potentially responsive records, and made its initial production on December 30, 2024; the parties have agreed on narrowed search terms, which substantially decreased the volume of the remaining results; USCIS is now processing the results of this revised search and expects to make its first production in mid-March

The parties will submit their next report in two months, on May 10, 2025, because the undersigned will be on trial for most of April. The parties will confer as appropriate in the interim. We thank the Court for its attention to this matter.

Respectfully,

MATTHEW PODOLSKY
Acting United States Attorney

By: /s/ Jean-David Barnea
JEAN-DAVID BARNEA
Assistant United States Attorney
Telephone: (212) 637-2679
Email: Jean-David.Barnea@usdoj.gov

cc: Counsel for plaintiffs (by ECF)